

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

DEBORAH J. SINATRA,  
D/B/A DEBORAH SINATRA INTERIORS

**CHAPTER** 13

**CASE NO.** 5 - 20 -bk- 00301-MJC

**Debtor(s)**

WILMINGTON SAVINGS FUND SOCIETY,  
FSB, d/b/a CHRISTIANA TRUST, NOT  
INDIVIDUALLY BUT AS TRUSTEE FOR  
PRETIUM MORTGAGEACQUISITION TRUST

**ADVERSARY NO.**    -    -ap-             
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

DEBORAH J. SINATRA,  
D/B/A DEBORAH SINATRA INTERIORS  
AND JACK N. ZAHAROPOULOUS (Trustee)

**Nature of Proceeding:** Motion to  
Reconsider Order

**Defendant(s)/Respondent(s)**

**Document #:**                                 

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

The parties are attempting to resolve the matter and require additional time to research payments made by the Debtor.

*Please continue for at least 30 days.*

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 10-13-2021

/s/Kimberly D. Martin, Esquire

Attorney for Deborah J. Sinatra, Debtor

Name: Kimberly D. Martin, Esquire

Phone Number: 570-253-6899

<sup>1</sup> No alterations or interlineations of this document are permitted.